

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

(01) KENNETH R. FRIEND,
[DOB: 07-27-1970],

(02) KENNA M. HARMON,
[DOB: 10-23-1978],

(04) NELSON OLMEDA,
a/k/a "Diego"
[DOB: 04-01-1990],

(05) ANTHONY J. VAN PELT,
[DOB: 08-12-1978],

(06) ANTHONY M. MASSONI,
[DOB: 11-01-1973],

(07) ANTHONY A. HATFIELD,
[DOB: 12-03-1983],

(08) CHERYL D. PALUCZAK,
[DOB: 03-20-1967],

(10) BONNIE L. AMODIO,
[DOB: 08-07-1985],

(11) DONETTE C. DAVIS,
[DOB: 12-09-1973],

(12) JOSEPH R. ALLEN,
[DOB: 06-12-1974],

(13) CARLOS TAPIA,
a/k/a Carlos Tapia Aguirre
[DOB: 07-29-1974],

(14) ROBERT A. EDSON,
[DOB: 10-02-1982],

No. 14-3106-01/29-CR-S-MDH

COUNT 1

21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A)
NLT 10 Years Imprisonment
NMT Life Imprisonment
NMT \$10 million fine
NLT 5 Years Supervised Release
Class A Felony

COUNT 2

18 U.S.C. § 1956(a)(1)(A)(B) and (h)
NMT 20 Years Imprisonment
NMT \$500,000 Fine
NMT 3 Years Supervised Release
Class C Felony

COUNTS 10, 14, 44-47, 51, 55-56, 60

21 U.S.C. § 841(a)(1) and (b)(1)(A)
NLT 10 Years Imprisonment
NMT Life Imprisonment
NMT \$10 million fine
NLT 5 Years Supervised Release
Class A Felony

**COUNTS 4, 7-9, 11, 13, 15, 17, 22, 26-27, 29,
36, 39-41, 44, 49-50, 62-65**

21 U.S.C. § 841(a)(1) and (b)(1)(B)
NLT 5 Years Imprisonment
NMT 40 Years Imprisonment
NMT \$5 million fine
NLT 4 Years Supervised Release
Class B Felony

**COUNTS 3, 5-6, 12, 16, 20-21, 23, 25, 30-35,
37-38, 43-43, 48**

21 U.S.C. § 841(a)(1) and (b)(1)(C)
NMT 20 Years Imprisonment
NMT \$1 million fine
NLT 3 Years Supervised Release
Class C Felony

(15) ROBERT CANALES,
[DOB: 12-29-1982],

(16) NEIL L. MANNING,
[DOB: 04-22-1968],

(17) TIFFANY A. BRAWLEY,
[DOB: 04-02-1989],

(18) JUSTIN D. OWENS,
[DOB: 07-11-1987],

(19) CLAYTON J. MENDES,
[DOB: 10-06-1980],

(20) KENNETH A. HOFFMAN,
[DOB: 10-25-1969],

(21) DAVID L. MILLER, JR.,
[DOB: 09-26-1975],

(22) BRANDON A. HOUSE,
[DOB: 06-06-1983],

(23) JEFFREY L. HATCH,
[DOB: 07-08-1969],

(24) GREGORY L. JONES,
a.k.a. "Pops"
[DOB: 08-03-1964],

(25) DAVID A. FLOYD,
[DOB: 12-22-1974],

(26) JEFFREY M. GARDNER,
[DOB: 06-09-1982],

(27) COREY A. STIENBARGER,
[DOB: 04-24-1989],

(28) BRANDON W. MALEN,
[DOB: 09-27-1989],

(29) HEATHER L. COURTOIS,
[DOB: 10-08-1983],

COUNTS 54, 57

21 U.S.C. § 856
NMT 20 Years Imprisonment
NMT \$500,000 fine
NMT 3 Years Supervised Release
Class C Felony

COUNTS 18, 52, 61

18 U.S.C. § 924(c)(1)(A)(i)
NLT 5 Years Imprisonment
(consecutive to Counts)
NMT Life Imprisonment
NMT \$250,000 fine
NLT 5 Years Supervised Release
Class A Felony

COUNTS 19, 24, 28, 53, 58-59

18 U.S.C. § 922(g)
NMT 10 Years Imprisonment
NMT \$250,000 Fine
NMT 3 Years Supervised Release
Class C Felony

COUNT 66

18 U.S.C. § 1956(a)(1)(A)(i)
NMT 20 Years Imprisonment
NMT \$500,000 Fine
NMT 3 Years Supervised Release
Class C Felony

FORFEITURE ALLEGATIONS 1-16

21 U.S.C. § 853

FORFEITURE ALLEGATIONS 17-21

18 U.S.C. § 924(d)(1)

\$100 Special Assessment (Each Count)

Defendants.

Defendants/Counts:

(01) Friend: 1, 32, 34, 37, 40, 42, 44-45, 49, 66, FA6
(02) Harmon: 1, 2, 15, 51-53, FA7, 9, 10, 14
(04) Olmeda: 1, 46, 66, FA5
(05) Van Pelt: 1, 27, 48, 55, FA8
(06) Massoni: 1, 28, 59, FA4, 9, 12
(07) Hatfield: 1, 50
(08) Paluczak: 1, 36
(10) Amodio: 1, 47
(11) Davis: 1, FA6
(12) Allen: 1, 60-61, FA10, 15
(13) Tapia: 1
(14) Edson: 1, 46, 62, FA5
(15) Canales: 1, 46, 62, FA5
(16) Manning: 1, 22-24, 31, 35, 43, FA16
(17) Brawley: 1, 29, 33
(18) Owens: 1, 38, 41
(19) Mendes: 1
(20) Hoffman: 1, 3, 4, 7, 8, 30, 39, 63, 65
(21) Miller: 1, 10, 13-14, 64
(22) House: 1, 25, FA1-2
(23) Hatch: 1, 12, 16-21, FA3, 11
(24) Jones: 1, 9, 11
(25) Floyd: 1, 26
(26) Gardner: 1, 5, 6, FA1
(27) Stienbarger: 1, 27
(28) Malen: 1, 48, 56-58, FA13
(29) Courtois: 1, 54

SECOND SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT 1

(Conspiracy to Distribute 500 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(A) and § 846

Between June 1, 2013, through November 29, 2014, said dates being approximate, in
Greene, Polk, Christian, Jasper, Laclede, and Webster Counties, in the Western District of

Missouri and elsewhere, defendants, **KENNETH R. FRIEND, KENNA M. HARMON, NELSON OLMEDA a/k/a "Diego," ANTHONY J. VAN PELT, ANTHONY M. MASSONI, ANTHONY A. HATFIELD, CHERYL D. PALUCZAK, BONNIE L. AMODIO, DONETTE C. DAVIS, JOSEPH R. ALLEN, CARLOS TAPIA, ROBERT A. EDSON, ROBERT CANALES, NEIL L. MANNING, TIFFANY A. BRAWLEY, JUSTIN D. OWENS, CLAYTON J. MENDES, KENNETH A. HOFFMAN, DAVID L. MILLER, JR, BRANDON A. HOUSE, JEFFREY L. HATCH, GREGORY L. JONES a.k.a. "Pops," DAVID A. FLOYD, JEFFREY M. GARDNER, COREY A. STIENBARGER, BRANDON W. MALEN, and HEATHER L. COURTOIS**, knowingly and intentionally conspired and agreed with each other and with others, known and unknown to the Grand Jury, to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846 and 841 (a)(1) and (b)(1)(A).

COUNT 2
(Conspiracy to Commit Money Laundering)
18 U.S.C. § 1956(h)

Between at least as early as June 1, 2014, and continuing until November 28, 2014, said dates being approximate, in Polk and Greene Counties in the Western District of Missouri, and elsewhere, the defendant, **KENNA M. HARMON**, did knowingly and intentionally combine, conspire, confederate, and agree with others, both known and unknown to the Grand Jury, to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, to wit:

(a) to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified

unlawful activity, that is, conspiracy to distribute methamphetamine, a Schedule II controlled substance, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and,

(b) to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, conspiracy to distribute methamphetamine, a Schedule II controlled substance, with the intent to promote the carrying on of that specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

Manner and Means

The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

a) During the course of the conspiracy to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, as charged in Count 1 of this indictment and beginning on or about June 1, 2014, and concluding on or about November 28, 2014, the defendant **KENNA M. HARMON** paid a total of \$324,185.07 for the construction of a residence located at 2250 E. 515th Road, Halfway, Polk County, Missouri.

- b) **HARMON** paid cash for the entire project.
- c) The entire amount of \$324,185.07 which **HARMON** paid for the construction of the residence was from the proceeds from the unlawful sale of methamphetamine.
- d) The proceeds were paid in installments to a local building contractor that **HARMON** hired to build the residence.
- e) **HARMON**, told Hennigh that she had inherited the cash which she used to build the residence and purchase the land on which the residence was located. This, in fact, was not true, as **HARMON** received no large inheritance during this time, had no legitimate source of income, and all her money came from the unlawful sale of methamphetamine.
- f) **HARMON** informed Hennigh, and others, about the inheritance in order to conceal the true source of the proceeds used to construct the residence and purchase the land.
- g) While building the residence, **HARMON** used the property to promote her continued sale of methamphetamine by storing methamphetamine at the residence, and asked Joseph **ALLEN** to provide security at the residence, in part, to protect the methamphetamine stored there.

All in violation of Title 18, United States Code, Section 1956(h).

COUNT 3

(Distribution of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(C)

On or about October 10, 2013, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **KENNETH A. HOFFMAN**, knowingly and intentionally, distributed a mixture or substance containing a detectable amount of methamphetamine, a Schedule II

controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 4

(Possession with Intent to Distribute 50 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(B)

On or about November 19, 2013, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **KENNETH A. HOFFMAN**, knowingly and intentionally possessed with the intent to distribute, 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 5

(Distribution of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(C)

On or about December 20, 2013, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **JEFFREY M. GARDNER**, knowingly and intentionally, distributed a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 6

(Distribution of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(C)

On or about January 9, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **JEFFREY M. GARDNER**, knowingly and intentionally, distributed a mixture or substance containing a detectable amount of methamphetamine, a Schedule II

controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 7

(Possession with Intent to Distribute 50 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(B)

On or about February 10, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **KENNETH A. HOFFMAN**, knowingly and intentionally possessed with the intent to distribute, 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 8

(Distribution of 50 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(B)

On or about February 20, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **KENNETH A. HOFFMAN**, knowingly and intentionally, distributed 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 9

(Distribution of 50 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(B)

On or about February 20, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **GREGORY L. JONES a.k.a. "Pops,"** knowingly and intentionally, distributed 50 grams or more of a mixture or substance containing a detectable

amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 10

(Possession with Intent to Distribute 500 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(A)

On or about March 5, 2014, in Webster County, in the Western District of Missouri and elsewhere, the defendant, **DAVID L. MILLER, JR.**, knowingly and intentionally possessed with the intent to distribute, 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

COUNT 11

(Distribution of 50 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(B)

On or about March 14, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **GREGORY L. JONES a.k.a. "Pops,"** knowingly and intentionally, distributed 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 12

(Distribution of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(C)

On or about April 1, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **JEFFREY L. HATCH**, knowingly and intentionally, distributed a mixture or substance containing a detectable amount of methamphetamine, a Schedule II

controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 13

(Distribution of 50 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(B)

On or about April 4, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **DAVID L. MILLER, JR.**, knowingly and intentionally, distributed 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 14

(Possession with Intent to Distribute 500 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(A)

On or about April 7, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **DAVID L. MILLER, JR.**, knowingly and intentionally possessed with the intent to distribute, 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

COUNT 15

(Distribution of 50 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(B)

On or about April 9, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **KENNA M. HARMON**, knowingly and intentionally, distributed 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a

Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 16

(Distribution of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(C)

On or about April 14, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **JEFFREY L. HATCH**, knowingly and intentionally, distributed a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 17

(Possession with Intent to Distribute 50 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(B)

On or about April 24, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **JEFFREY L. HATCH**, knowingly and intentionally possessed with the intent to distribute, 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 18

(Possession of Firearm in Furtherance of Drug Trafficking Crime)
18 U.S.C. § 924(c)(1)(A)

On or about April 24, 2014, in Greene County, in the Western District of Missouri, the defendant, **JEFFREY L. HATCH**, knowingly possessed a firearm, to wit: a Springfield Armory brand semi-automatic 9mm handgun, serial number US974784, in furtherance of drug trafficking crimes for which he may be prosecuted in a court of the United States, to wit: conspiracy to

distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, as charged in Count 1, and possession with intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, as charged in Count 17 of this indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 19

(Possession of a Firearm by Convicted Felon and Drug User)

18 U.S.C. §§ 922(g)(1) and (3) and 924(a)(2)

On or about April 24, 2014, in Greene County, in the Western District of Missouri, the defendant, **JEFFREY L. HATCH**, having been convicted of a crime punishable by imprisonment for a term exceeding one year and who was at the time an unlawful user of a controlled substance, i.e., methamphetamine, did knowingly possess, in and affecting commerce, a firearm, that is, a Springfield Armory brand semi-automatic 9mm handgun, serial number US974784, which had been transported in interstate commerce, all in violation of Title 18, United States Code, Sections 922(g)(1) and (3) and 924(a)(2).

COUNT 20

(Distribution of a Mixture or Substance

Containing a Detectable Amount of Methamphetamine)

21 U.S.C. § 841(a)(1) and (b)(1)(C)

On or about May 22, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **JEFFREY L. HATCH**, knowingly and intentionally, distributed a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 21

(Possession with Intent to Distribute a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(C)

On or about May 28, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **JEFFREY L. HATCH**, knowingly and intentionally possessed with the intent to distribute, a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 22

(Possession with Intent to Distribute 50 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(B)

On or about June 12, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **NEIL L. MANNING**, knowingly and intentionally possessed with the intent to distribute, 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 23

(Possession with Intent to Distribute a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(C)

On or about June 24, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **NEIL L. MANNING**, knowingly and intentionally possessed with the intent to distribute, a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 24
(Possession of a Firearm by Convicted Felon)
18 U.S.C. §§ 922(g) and 924(a)(2)

On or about June 24, 2014, in Greene County, in the Western District of Missouri, the defendant, **NEIL L. MANNING**, having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, firearms, that is, a 9mm Taurus semi-automatic pistol, model PT111 G2, Serial Number TGN28500; a .40 caliber Llama semi-automatic pistol, model MAX-I-L/F, Serial Number 07-04-04996-95; and ammunition, which have been transported in interstate commerce, all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 25
(Possession with Intent to Distribute a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(C)

On or about July 8, 2014, in Christian County, in the Western District of Missouri and elsewhere, the defendant, **BRANDON A. HOUSE**, knowingly and intentionally possessed with the intent to distribute, a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 26
(Possession with Intent to Distribute 50 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(B)

On or about August 1, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **DAVID A. FLOYD**, knowingly and intentionally possessed with the intent to distribute, 50 grams or more of a mixture or substance containing a detectable amount

of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 27

(Distribution of 50 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(B)

On or about August 19, 2014, in Greene County, in the Western District of Missouri and elsewhere, defendants, **ANTHONY J. VAN PELT and COREY A. STIENBARGER**, knowingly and intentionally, distributed 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 28

(Possession of a Firearm by Drug User)
18 U.S.C. §§ 922(g)(3) and 924(a)(2)

On or about September 4, 2014, in Greene County, in the Western District of Missouri, the defendant, **ANTHONY M. MASSONI**, who was at the time an unlawful user of a controlled substance, i.e., methamphetamine, did knowingly possess, in and affecting commerce, a firearm, and ammunition, that is: (1) a Taurus International 1911 Semi-Automatic .45 caliber handgun, serial number NGU5625; (2) boxes of 30-30 caliber ammunition; and (3) boxes of 9 mm caliber ammunition, which had been transported in interstate commerce, all in violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(2).

COUNT 29

(Possession with Intent to Distribute 50 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(B)

On or about September 17, 2014, in Laclede County, in the Western District of Missouri and elsewhere, the defendant, **TIFFANY A. BRAWLEY**, knowingly and intentionally

possessed with the intent to distribute, 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 30

(Distribution of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(C)

On or about September 18, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **KENNETH A. HOFFMAN**, knowingly and intentionally, distributed a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 31

(Possession with Intent to Distribute a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(C)

On or about October 7, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **NEIL L. MANNING**, knowingly and intentionally possessed with the intent to distribute, a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 32

(Distribution of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(C)

On or about October 10, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **KENNETH R. FRIEND**, distributed a mixture or substance

containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 33

(Possession with Intent to Distribute a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(C)

On or about October 10, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **TIFFANY A. BRAWLEY**, knowingly and intentionally possessed with the intent to distribute, a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 34

(Distribution of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(C)

On or about October 12, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **KENNETH R. FRIEND**, distributed a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 35

(Possession with Intent to Distribute a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(C)

On or about October 12, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **NEIL L. MANNING**, knowingly and intentionally possessed with the intent to distribute, a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 36

(Possession with Intent to Distribute 50 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(B)

On or about October 15, 2014, in Pulaski County, in the Western District of Missouri and elsewhere, the defendant, **CHERYL D. PALUCZAK**, knowingly and intentionally possessed with the intent to distribute, 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 37

(Distribution of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(C)

On or about October 24, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **KENNETH R. FRIEND**, distributed a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 38

(Possession with Intent to Distribute a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(C)

On or about October 24, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **JUSTIN D. OWENS**, knowingly and intentionally possessed with the intent to distribute, a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 39

(Possession with Intent to Distribute 50 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)

21 U.S.C. § 841(a)(1) and (b)(1)(B)

On or about October 24, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **KENNETH A. HOFFMAN**, knowingly and intentionally possessed with the intent to distribute, 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 40

(Distribution of 50 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)

21 U.S.C. § 841(a)(1) and (b)(1)(B)

On or about October 28, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **KENNETH R. FRIEND**, distributed 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 41

(Possession with Intent to Distribute 50 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)

21 U.S.C. § 841(a)(1) and (b)(1)(B)

On or about October 28, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **JUSTIN D. OWENS**, knowingly and intentionally possessed with the intent to distribute, 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 42

(Distribution of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(C)

On or about October 29, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **KENNETH R. FRIEND**, distributed a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 43

(Possession with Intent to Distribute a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(C)

On or about October 29, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **NEIL L. MANNING**, knowingly and intentionally possessed with the intent to distribute, a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 44

(Distribution of 50 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(B)

On or about November 3, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **KENNETH R. FRIEND**, distributed 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 45

(Possession with Intent to Distribute 500 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(A)

On or about November 3, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **KENNETH R. FRIEND**, knowingly and intentionally possessed with the intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

COUNT 46

(Possession with Intent to Distribute 500 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(A)

Between November 3, 2014, and November 5, 2014, in Greene and Camden Counties, in the Western District of Missouri and elsewhere, defendants, **NELSON OLMEDA a/k/a "Diego," ROBERT A. EDSON**, and **ROBERT CANALES**, knowingly and intentionally possessed with the intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A) and Title 18, United States Code, Section 2.

COUNT 47

(Possession with Intent to Distribute 500 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(A)

On or about November 6, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **BONNIE L. AMODIO**, knowingly and intentionally possessed with the intent to distribute, 500 grams or more of a mixture or substance containing a detectable

amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A) and Title 18, United States Code, Section 2.

COUNT 48

(Distribution of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(C)

On or about November 15, 2014, in Greene County, in the Western District of Missouri and elsewhere, defendants, **ANTHONY J. VAN PELT and BRANDON W. MALEN**, knowingly and intentionally, distributed a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 49

(Distribution of 50 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(B)

On or about November 17, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **KENNETH R. FRIEND**, distributed 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 50

(Possession with Intent to Distribute 50 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(B)

On or about November 17, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **ANTHONY HATFIELD**, knowingly and intentionally possessed with the intent to distribute, 50 grams or more of a mixture or substance containing a detectable

amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 51

(Possession with Intent to Distribute 500 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(A)

On or about November 27, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **KENNA M. HARMON**, knowingly and intentionally possessed with the intent to distribute, 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

COUNT 52

(Possession of Firearm in Furtherance of Drug Trafficking Crime)
18 U.S.C. § 924(c)(1)(A)

On or about November 27, 2014, in Greene County, in the Western District of Missouri, the defendant, **KENNA M. HARMON**, knowingly possessed a firearm, to wit: a Jennings by Calwestco, model J-22, .22 caliber pistol, serial number 365743, in furtherance of drug trafficking crimes for which she may be prosecuted in a court of the United States, to wit: conspiracy to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, as charged in Count 1 and possession with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, as charged in Count 51 of this indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 53
(Possession of a Firearm by Convicted Felon)
18 U.S.C. §§ 922(g)(1) and 924(a)(2)

On or about November 27, 2014, in Greene County, in the Western District of Missouri, the defendant, **KENNA M. HARMON**, having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm, that is, a Jennings by Calwestco, model J-22, .22 caliber pistol, serial number 365743, which had been transported in interstate commerce, all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 54
(Maintaining Drug-Involved Premises)
21 U.S.C. § 856(a)(2)

On or about November 27, 2014, in Greene County, in the Western District of Missouri, the defendant, **HEATHER L. COURTOIS**, while managing and controlling a building, at 648 Dana, Republic, Missouri, as an owner or lessee, knowingly and intentionally made available for use, with and without compensation, said building for the purpose of unlawfully storing, distributing and using, methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 856(a)(2).

COUNT 55
(Possession with Intent to Distribute 500 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(A)

On or about November 27, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **ANTHONY J. VAN PELT**, knowingly and intentionally possessed with the intent to distribute, 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

COUNT 56

(Possession with Intent to Distribute 500 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)

21 U.S.C. § 841(a)(1) and (b)(1)(A)

On or about November 27, 2014, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **BRANDON W. MALEN**, knowingly and intentionally possessed with the intent to distribute, 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

COUNT 57

(Maintaining Drug-Involved Premises)

21 U.S.C. § 856(a)(2)

On or about November 27, 2014, in Greene County, in the Western District of Missouri, the defendant, **BRANDON W. MALEN**, while managing and controlling a building, at 1947 S. Missouri, Springfield, Missouri, as an owner or lessee, knowingly and intentionally made available for use, with and without compensation, said building for the purpose of unlawfully storing, distributing and using, methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 856(a)(2).

COUNT 58

(Possession of a Firearm by Drug User)

18 U.S.C. §§ 922(g)(3) and 924(a)(2)

On or about November 27, 2014, in Greene County, in the Western District of Missouri, the defendant, **BRANDON W. MALEN**, who was at the time an unlawful user of a controlled substance, i.e., methamphetamine, did knowingly possess, in and affecting commerce, firearms and ammunition, that is: (1) Remington model 742 Woodmaster, .30-06 caliber rifle, serial number B7143875; (2) Remington, model 742 Woodmaster, .30-06 caliber rifle, serial number B7144264; (3) Savage, brand name "Stevens" model 87 B, .22 rifle, no serial number located;

(4) Browning .22 caliber semi-automatic rifle, serial number 2T32807; (5) 77 rounds of .30-06 caliber ammunition, various manufacturers; and (6) 201 rounds of .38 caliber ammunition, various manufacturers, all of which have been transported in interstate commerce, all in violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(2).

COUNT 59

(Possession of a Firearm by Drug User)
18 U.S.C. §§ 922(g)(3) and 924(a)(2)

On or about November 28, 2014, in Greene County, in the Western District of Missouri, the defendant, **ANTHONY M. MASSONI**, who was at the time an unlawful user of a controlled substance, i.e., methamphetamine, did knowingly possess, in and affecting commerce, firearms and ammunition, that is: (1) Taurus, Model 608, .357 caliber handgun, serial number HM888751; (2) eight .357 caliber Hornady bullets; and (3) miscellaneous ammunition, all of which have been transported in interstate commerce, all in violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(2).

COUNT 60

(Possession with Intent to Distribute 500 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(A)

On or about November 28, 2014, in Polk County, in the Western District of Missouri and elsewhere, the defendant, **JOSEPH R. ALLEN**, knowingly and intentionally possessed with the intent to distribute, 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

COUNT 61
(Possession of Firearm in Furtherance of Drug Trafficking Crime)
18 U.S.C. § 924(c)(1)(A)

On or about November 28, 2014, in Polk County, in the Western District of Missouri, the defendant, **JOSEPH R. ALLEN**, knowingly possessed firearms, to wit: (1) Savage Arms model 62, .22 rifle, serial number 0261458; (2) Mossberg, model 535, 12 gauge shotgun, serial number AT092160; (3) Remington, model 41, .22 caliber rifle; (4) Jennings by Bryco Arms, model .22 pistol, serial number 474911; (5) Glock model 23, .40 caliber pistol, serial number VZF013; (6) Rock Island Amory, model M1911-A1 CS, .45 caliber pistol, serial number RIA1548892; (7) Cobra Enterprise of Utah, model CB22M, .22 caliber derringer, serial number CT142257; and (8) a Glock model 27, .40 caliber pistol, serial number WRV362, in furtherance of drug trafficking crimes for which he may be prosecuted in a court of the United States, to wit: conspiracy to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, as charged in Count 1 and possession with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, as charged in Count 60 of this indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 62
(Possession with Intent to Distribute 50 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(B)

On or about December 22, 2014, in Greene County, in the Western District of Missouri and elsewhere, defendants, **ROBERT A. EDSON** and **ROBERT CANALES**, knowingly and intentionally possessed with the intent to distribute, 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in

violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B) and Title 18, United States Code, Section 2.

COUNT 63

(Possession with Intent to Distribute 50 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(B)

On or about January 30, 2015, in Taney County, in the Western District of Missouri and elsewhere, the defendant, **KENNETH A. HOFFMAN**, knowingly and intentionally possessed with the intent to distribute, 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 64

(Possession with Intent to Distribute 50 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(B)

On or about February 9, 2015, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **DAVID L. MILLER, JR.**, knowingly and intentionally possessed with the intent to distribute, 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 65

(Possession with Intent to Distribute 50 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(B)

On or about May 28, 2015, in Greene County, in the Western District of Missouri and elsewhere, the defendant, **KENNETH A. HOFFMAN**, knowingly and intentionally possessed with the intent to distribute, 50 grams or more of a mixture or substance containing a detectable

amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT 66

(Engaging in Monetary Transactions to Promote Unlawful Activity)

18 U.S.C. § 1956(a)(1)(A)(i)

Between November 3, 2014, and November 5, 2014, in Greene County, in the Western District of Missouri, the defendant, **KENNETH R. FRIEND**, knowingly conducted and attempted to conduct a financial transaction affecting interstate and foreign commerce, to wit: a payment, in that, the defendant paid approximately \$20,000 in United States Currency to **NELSON OLMEDA a/k/a "Diego"** for the purchase of methamphetamine, which payment involved the proceeds of specified unlawful activity, that is, the distribution of methamphetamine, in violation of Title 21, United States Code, Section 841(a)(1), with the intent to promote the carrying on of that specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i), and 2.

FORFEITURE ALLEGATION 1

The allegations contained in Count 1 above are hereby incorporated as though fully set forth herein for the purpose of charging criminal forfeiture to the United States of America pursuant to Title 21, United States Code, Section 853.

As a result of committing the controlled substance offense alleged in Count 1 of this Indictment, **BRANDON A. HOUSE and JEFFREY M. GARDNER**, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from any proceeds obtained directly or indirectly, as a result of the said violations, and

any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations, including but not limited to the following:

1. Approximately \$4,000 in United States currency, seized on or about December 12, 2013.

FORFEITURE ALLEGATION 2

The allegations contained in Count 1 above are hereby incorporated as though fully set forth herein for the purpose of charging criminal forfeiture to the United States of America pursuant to Title 21, United States Code, Section 853.

As a result of committing the controlled substance offense alleged in Count 1 of this Indictment, **BRANDON A. HOUSE**, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from any proceeds obtained directly or indirectly, as a result of the said violations, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations, including but not limited to the following:

1. Approximately \$13,850 in United States currency, seized on or about January 27, 2014.

FORFEITURE ALLEGATION 3

The allegations contained in Count 1 above are hereby incorporated as though fully set forth herein for the purpose of charging criminal forfeiture to the United States of America pursuant to Title 21, United States Code, Section 853.

As a result of committing the controlled substance offense alleged in Count 1 of this Indictment, **JEFFREY L. HATCH**, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from any proceeds obtained directly or indirectly, as a result of the said violations, and any property used, or

intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations, including but not limited to the following:

1. Approximately \$1,390.10 in United States currency, seized on or about May 28, 2014.

FORFEITURE ALLEGATION 4

The allegations contained in Count 1 above are hereby incorporated as though fully set forth herein for the purpose of charging criminal forfeiture to the United States of America pursuant to Title 21, United States Code, Section 853.

As a result of committing the controlled substance offense alleged in Count 1 of this Indictment, **ANTHONY M. MASSONI**, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from any proceeds obtained directly or indirectly, as a result of the said violations, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations, including but not limited to the following:

1. Four rings seized from **MASSONI** on or about September 4, 2014.

FORFEITURE ALLEGATION 5

The allegations contained in Count 1 above are hereby incorporated as though fully set forth herein for the purpose of charging criminal forfeiture to the United States of America pursuant to Title 21, United States Code, Section 853.

As a result of committing the controlled substance offense alleged in Count 1 of this Indictment, **NELSON OLMEDA a/k/a "Diego," ROBERT A. EDSON, and ROBERT CANALES**, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from any proceeds obtained directly or indirectly, as a result of the said violations, and any property used, or intended to be used, in any

manner or part, to commit, or to facilitate the commission of the said violations, including but not limited to the following:

1. Approximately \$20,000 and \$1,302 in United States currency, seized on or about November 6, 2014.

FORFEITURE ALLEGATION 6

The allegations contained in Count 1 above are hereby incorporated as though fully set forth herein for the purpose of charging criminal forfeiture to the United States of America pursuant to Title 21, United States Code, Section 853.

As a result of committing the controlled substance offense alleged in Count 1 of this Indictment, **KENNETH R. FRIEND** and **DONETTE C. DAVIS** shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from any proceeds obtained directly or indirectly, as a result of the said violations, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations, including but not limited to the following:

1. Approximately \$33,600 and \$710 in United States currency, seized on or about November 27, 2014.
2. A 1992 Harley Davidson Motorcycle, Missouri registration CW-3UA, VIN #1HD1BKL11NY035961, seized on or about November 27, 2014.

FORFEITURE ALLEGATION 7

The allegations contained in Count 1 above are hereby incorporated as though fully set forth herein for the purpose of charging criminal forfeiture to the United States of America pursuant to Title 21, United States Code, Section 853.

As a result of committing the controlled substance offense alleged in Count 1 of this Indictment, **KENNA M. HARMON**, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from any proceeds

obtained directly or indirectly, as a result of the said violations, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations, including but not limited to the following:

1. Real property located at 2250 E. 515th Road, Half Way, Polk County, Missouri, with all appurtenances, improvements, and attachments thereon. The legal description of this property is as follows:

Lot C in Way-Forty, a Subdivision in Polk County, Missouri according to the plat recorded in Plat Book 6 at Page 47 of the Polk County Recorder's Office

Parcel ID: 89-16-0.5-15-000-000-005.03;
2. Approximately \$4,604 in United States currency, seized from **HARMON's** vehicle on or about November 27, 2014;
3. Bracelets seized from **HARMON** on or about November 27, 2014;
4. A 2004 Chevrolet Avalanche, VIN #3GNEK12T84G210528, bearing Missouri registration 1UV432, seized on or about November 28, 2014. The vehicle is titled in the name of Ruth Ann Gross, **HARMON's** mother, with a Transfer on Death provision to "Grant Kaedin," **HARMON's** son;
5. A 2004 BMW—5 Series, VIN #WBANB33594B113218, seized on or about November 27, 2014. The vehicle is titled in the name of Ruth Ann Gross, **HARMON's** mother, with a Transfer on Death provision to "Grant Kayden," **HARMON's** son.

FORFEITURE ALLEGATION 8

The allegations contained in Count 1 above are hereby incorporated as though fully set forth herein for the purpose of charging criminal forfeiture to the United States of America pursuant to Title 21, United States Code, Section 853.

As a result of committing the controlled substance offense alleged in Count 1 of this Indictment, **ANTHONY J. VAN PELT**, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from any proceeds obtained directly or indirectly, as a result of the said violations, and any property used, or

intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations, including but not limited to the following:

1. Approximately \$23,663 in United States currency, seized from **VAN PELT's** vehicle on or about November 27, 2014.

FORFEITURE ALLEGATION 9

The allegations contained in Count 1 above are hereby incorporated as though fully set forth herein for the purpose of charging criminal forfeiture to the United States of America pursuant to Title 21, United States Code, Section 853.

As a result of committing the controlled substance offense alleged in Count 1 of this Indictment, **KENNA M. HARMON** and **ANTHONY M. MASSONI**, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from any proceeds obtained directly or indirectly, as a result of the said violations, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations, including but not limited to the following:

1. Approximately \$20,000 in United States currency, seized on or about September 4, 2014;
2. A 2001 Harley-Davidson motorcycle, VIN #1HD4CJM141K115979; titled in **MASSONI's** name, and seized from Kenna **HARMON's** property in Polk County, Missouri, on or about November 28, 2014; and
3. Approximately \$37,000 in United States currency, seized on or about December 3, 2014.

FORFEITURE ALLEGATION 10

The allegations contained in Count 1 above are hereby incorporated as though fully set forth herein for the purpose of charging criminal forfeiture to the United States of America pursuant to Title 21, United States Code, Section 853.

As a result of committing the controlled substance offense alleged in Count 1 of this Indictment, **KENNA M. HARMON** and **JOSEPH R. ALLEN**, shall forfeit to the United

States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from any proceeds obtained directly or indirectly, as a result of the said violations, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations, including but not limited to the following:

1. A 2005 Mazda 6 Sedan, VIN #1YVHP80D255M57560, bearing Missouri registration AH9A7S. The vehicle is titled in the name of **ALLEN**, and was seized on or about December 19, 2014;
2. A 2006 Hyundai Tiberon, VIN #KMHHN65F36U209380, seized on or about December 2, 2014. The vehicle is titled in the name of **ALLEN**.

FORFEITURE ALLEGATION 11

18 U.S.C. § 924(d)(1)

The allegations contained in Counts 18 and 19, above, are hereby incorporated as though fully set forth herein for the purpose of charging criminal forfeiture to the United States of America pursuant to Title 18, United States Code, Section 924(d)(1).

As a result of committing offenses in violation of Title 18, United States Code, Sections 922 and 924, as charged herein, **JEFFREY L. HATCH** shall forfeit to the United States all firearms and ammunition involved in the particular aforesaid offenses as set forth above, including but not limited to:

1. a Springfield Armory brand semi-automatic 9mm handgun, serial number US974784, seized from **HATCH** on or about April 24, 2014.

FORFEITURE ALLEGATION 12

18 U.S.C. § 924(d)(1)

The allegations contained in Count 28, above, are hereby incorporated as though fully set forth herein for the purpose of charging criminal forfeiture to the United States of America pursuant to Title 18, United States Code, Section 924(d)(1).

As a result of committing offenses in violation of Title 18, United States Code, Sections 922 and 924, as charged herein, **ANTHONY M. MASSONI** shall forfeit to the United States all

firearms and ammunition involved in the particular aforesaid offenses as set forth above, including but not limited to:

1. a Taurus International 1911 Semi-Automatic .45 caliber handgun, serial number NGU5625;
2. boxes of 30-30 caliber ammunition; and
3. boxes of 9 mm caliber ammunition, all seized from **MASSONI** on or about September 4, 2014.

FORFEITURE ALLEGATION 13

18 U.S.C. § 924(d)(1)

The allegations contained in Count 58, above, are hereby incorporated as though fully set forth herein for the purpose of charging criminal forfeiture to the United States of America pursuant to Title 18, United States Code, Section 924(d)(1).

As a result of committing offenses in violation of Title 18, United States Code, Sections 922 and 924, as charged herein, **BRANDON W. MALEN** shall forfeit to the United States all firearms and ammunition involved in the particular aforesaid offenses as set forth above, including but not limited to:

1. Remington model 742 Woodmaster, .30-06 caliber rifle, serial number B7143875;
2. Remington, model 742 Woodmaster, .30-06 caliber rifle, serial number B7144264;
3. Savage, brand name "Stevens" model 87 B, .22 rifle, no serial number located;
4. Browning .22 caliber semi-automatic rifle, serial number 2T32807;
5. 77 rounds of .30-06 caliber ammunition, various manufacturers; and
6. 201 rounds of .38 caliber ammunition, various manufacturers, all seized from **MALEN** on or about November 27, 2014.

FORFEITURE ALLEGATION 14

18 U.S.C. § 924(d)(1)

The allegations contained in Counts 52 and 53, above, are hereby incorporated as though fully set forth herein for the purpose of charging criminal forfeiture to the United States of America pursuant to Title 18, United States Code, Section 924(d)(1).

As a result of committing offenses in violation of Title 18, United States Code, Sections 922 and 924, as charged herein, **KENNA M. HARMON** shall forfeit to the United States all firearms and ammunition involved in the particular aforesaid offenses as set forth above, including but not limited to:

a Jennings by Calwestco, model J-22, .22 caliber pistol, serial number 365743 seized from **HARMON** on or about November 27, 2014.

FORFEITURE ALLEGATION 15
18 U.S.C. § 924(d)(1)

The allegations contained in Count 61, above, are hereby incorporated as though fully set forth herein for the purpose of charging criminal forfeiture to the United States of America pursuant to Title 18, United States Code, Section 924(d)(1).

As a result of committing offenses in violation of Title 18, United States Code, Sections 922 and 924, as charged herein, **JOSEPH R. ALLEN** shall forfeit to the United States all firearms and ammunition involved in the particular aforesaid offenses as set forth above, including but not limited to:

1. Savage Arms model 62, .22 rifle, serial number 0261458;
2. Mossberg, model 535, 12 gauge shotgun, serial number AT092160;
3. Remington, model 41, .22 caliber rifle;
4. Jennings by Bryco Arms, model .22 pistol, serial number 474911;
5. Glock model 23, .40 caliber pistol, serial number VZF013;
6. Rock Island Amory, model M1911-A1 CS, .45 caliber pistol, serial number RIA1548892;
7. Cobra Enterprise of Utah, model CB22M, .22 caliber derringer, serial number CT142257; and
8. a Glock model 27, .40 caliber pistol, serial number WRV362, all seized from **ALLEN** on or about November 28, 2014.

FORFEITURE ALLEGATION 16

The allegations contained in Count 24, above, are hereby incorporated as though fully set forth herein for the purpose of charging criminal forfeiture to the United States of America pursuant to Title 18, United States Code, Section 924(d)(1).

As a result of committing offenses in violation of Title 18, United States Code, Sections 922 and 924, as charged herein, **NEIL L. MANNING** shall forfeit to the United States all firearms and ammunition involved in the particular aforesaid offenses as set forth above, including but not limited to:

1. a 9mm Taurus semi-automatic pistol, model PT111 G2, Serial Number TGN28500; and
2. a .40 caliber Llama semi-automatic pistol, model MAX-I-L/F, Serial Number 07-04-04996-95; and
3. ammunition, all seized from **MANNING** on or about June 24, 2014.

A TRUE BILL

/s/Linda Jordan

FOREPERSON OF THE GRAND JURY

/s/Randall D. Eggert

Randall D. Eggert

Assistant United States Attorney

DATED: 07/22/2015

Springfield, Missouri